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Attorneys for Defendant Shoshana Zipor

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES,

Plaintiff,

vs.

SHOSHANA ZIPOR,

Defendants.

Case No. 2:22-cr-00020-JAD-VCF

**Unopposed Motion to Modify Terms of
Probation (One Time Return of Passport)**

Defendant Shoshana Zipor (the “defendant” or “Ms. Zipor”), by and through undersigned counsel, moves this Court, pursuant to Federal Rule of Criminal Procedure 32.1(c), for a one-time temporary return of her passports for the purpose of getting them renewed. The government does not oppose this motion.

Points and Authorities

A. Request for Return and Re-Surrender of Passport.

On March 8, 2022, Ms. Zipor pled guilty to one count of False Statement in an Immigration Document, in violation of 18 U.S.C. §§ 1546(a) and 2. Because this was her first appearance before the Court, it doubled as her Initial Appearance. The Court released Ms. Zipor on a personal recognizance bond and directed her to surrender her passports and limited her travel to the continental United States. ECF No. 7.

Since that time, United States Pretrial Services has been in possession of Ms. Zipor’s United States and Israeli passports. The Defendant previously moved for, and the Court granted,

1 an unopposed request to travel to Israel that required the temporary return of her passports to her.
2 ECF No. 16. Ms. Zipor traveled abroad as allowed, returned to the United States as directed, and
3 promptly returned her passports to her Pre-Trial Services Officer, Jeremiah Bassard. Ms. Zipor
4 fastidiously adhered to the Court's previous instruction with regard to the return of her passports
5 and travel and has never otherwise abused the Court's trust with regard to her conditions of release.

6 On October 2, 2023, the Court sentenced Ms. Zipor to a three-year term of probation. Her
7 conditions of supervision do not contain a strict prohibition on travel, overseas or otherwise;
8 instead, she may leave "the federal judicial district where she is authorized to reside," if she first
9 obtains permission from the Court and/or her probation officer. ECF No. 32. As the Court knows
10 from Ms. Zipor's Pre-Trial Services Report, she has substantial family ties in Israel. PSR at ¶ 63
11 – 64. As the Court is also aware, Israel is in the midst of an armed conflict with the Palestinian
12 militant group Hamas, which has resulted in the kidnapping and killing of a large number of
13 Israelis.
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15 Ms. Zipor is concerned that she may have to return to Israel on short notice to care for
16 family members who are harmed in the war. Both her United States and Israeli passports are
17 expired. She respectfully requests that the Court authorize the return of her passports for the sole
18 purpose of getting them renewed. Once renewed, Ms. Zipor will, within three days of receipt of
19 the new passports, return them to the custody of her assigned Probation officer.¹ In the event she
20 seeks to travel to Israel, she will make the appropriate motion to the Court.
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22 **B. Conclusion**

23 For all the foregoing reasons, Mr. Zipor respectfully requests that the Court grant this
24 motion to modify her terms of probation to facilitate the temporary return of her passports. She
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¹ Ms. Zipor estimates that it should take approximately six to eight weeks to renew her United States passport and approximately three weeks to renew her Israeli passport.

1 respectfully requests that the Court issue an Order: (1) directing United States Pretrial Services to
2 return Ms. Zipor's passport to her for the sole purpose of having them renewed; and (2) requiring
3 Ms. Zipor to return her passport to United States Department of Probation within three business
4 days of receiving the renewed passports back from the immigration authorities.

5 DATED this 13th day of November 2023.

6 CLARK HILL PLLC

7 /s/ Crane Pomerantz

8 Crane M. Pomerantz, Esq.

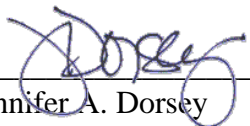
9 Nevada Bar No. 14103

10 1700 S. Pavilion Center Drive, Suite 500

11 Las Vegas, NV 89135

12 *Attorneys for Defendant Zipor*

13 **It is so ordered:**

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16 _____
17 Jennifer A. Dorsey
18 United States District Judge

19 Dated: November 16, 2023
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